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Plaintiff SOPHOS INC. and Counterclaim
Plaintiff SOPHOS LTD.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

FORTINET, INC., a corporation

Plaintiff,

vs.

SOPHOS, INC., a corporation, MICHAEL
VALENTINE, an individual, and JASON
CLARK, an individual.

Defendants.

SOPHOS INC. and SOPHOS LTD.,
corporations,

Counterclaim Plaintiffs,

vs.

FORTINET, INC., a corporation,

Counterclaim Defendant.

Case No. 3:13-cv-05831-EMC-DMR

**STIPULATION REGARDING DKT.
NOS. 185 AND 187**

1 WHEREAS Plaintiff and Counterclaim-Defendant Fortinet, Inc. (“Fortinet”) and Defendants
2 and Counterclaim-Plaintiffs Sophos Inc. and Sophos Ltd. (collectively, “Sophos”) filed a joint
3 discovery letter on July 16, 2015 (Dkt. No. 177);

4 WHEREAS the Court denied the joint discovery letter in part (without prejudice) with respect
5 to Sophos’ responses to Fortinet's Requests for Production of Documents Nos. 123-134, 149-165, and
6 174 (“Requests”) and ordered the parties to meet and confer further regarding Fortinet’s Requests
7 (Dkt. No. 185);

8 WHEREAS the Court ordered the parties to file a joint discovery letter brief of no more than
9 four pages by August 3, 2015 at 9:00 a.m. if the parties were unable to resolve the dispute (Dkt. No.
10 185);

11 WHEREAS the Court denied the joint discovery letter in part (without prejudice) regarding
12 Fortinet’s production of documents identified by Messrs. Mock and Bray, the deposition of James
13 Bray, and Fortinet’s production of emails, ordering the parties to meet and confer further (Dkt. No.
14 187);

15 WHEREAS the Court ordered the parties to file a joint discovery letter brief of no more than
16 six pages by August 3, 2015 at 9:00 a.m. if the parties were unable to resolve the dispute (Dkt. No.
17 187);

18 WHEREAS the parties have meet and conferred as directed by the Court regarding the pending
19 discovery disputes on the issues identified in the Court’s orders (Dkt. Nos. 185, 187);

20 WHEREAS the parties have reached a compromise and, thus, resolved all discovery disputes
21 identified in Dkt. Nos. 185 and 187;

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties that:

2 1) Pursuant to the parties' agreement resolving all issues in Dkt. Nos. 185 and 187, the parties
3 will not file any joint discovery letters on August 3, 2015; and

4 2) All other issues contained in Dkt. No. 177 remain before the Court, to be addressed at the
5 August 27, 2015 hearing (Dkt. No. 182).

6
7 DATED: July 31, 2015

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

8
9 By /s/ John M. Neukom

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Attorneys for Plaintiff FORTINET, INC.

16
17 DATED: July 31, 2015

DLA PIPER LLP (US)

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25 Attorneys for Defendant and Counterclaim
26 Plaintiff SOPHOS INC. and Counterclaim
27 Plaintiff SOPHOS LTD.
28

SIGNATURE ATTESTATION

Pursuant to Local Rule 5.1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from David Knudson.

/s/ Grant N. Margeson

Grant N. Margeson